

EXHIBIT 11

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

LORI LYNN HEETHUIS,

Plaintiff,

Case No. 1:19-cv-00940

-vs-

HON: PAUL L. MALONEY

COUNTY OF MUSKEGON; and,
RYAN BOIKE, Individually,

Defendants.

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& AMTSBUECHLER PC
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**DEFENDANTS' THIRD REQUEST FOR PRODUCTION OF
DOCUMENTS TO PLAINTIFF**

Defendants, County of Muskegon and Ryan Boike, through their attorneys,
ROSATI SCHULTZ JOPPICH & AMTSBUECHLER, P.C., pursuant to Fed. R.
Civ. P. 34, submits its Third Request for Production to Plaintiff:

1. Produce for inspection the cell phone chip(s) from Plaintiff's previous

Samsung cell phone device(s) about which Plaintiff testified at her deposition. Inspection shall occur on November 9, 2020 at Rosati, Schultz, Joppich & Amtsbuechler, PC's Lansing Office at 10:00 a.m. or an alternative time, place, and location mutually agreeable by both parties. Defendants would like to inspect the phone chip(s) for the following, related to the allegations of this lawsuit:

- a. Video recordings;
- b. Audio recordings;
- c. Text messages; and
- d. Voicemails.

RESPONSE:

2. Produce for inspection the cell phone(s) used by Plaintiff in 2017, 2018 and 2019. Inspection shall occur on November 9, 2020 at Rosati, Schultz, Joppich & Amtsbuechler, PC's Lansing Office at 10:00 a.m. or an alternative time, place, and location mutually agreeable by both parties. Defendants would like to inspect the cell phone(s) Plaintiff used by in 2017, 2018 and 2019 for the following related to the allegations of this lawsuit:

- a. Video recordings;
- b. Audio recordings;
- c. Text messages; and
- d. Voicemails.

RESPONSE:

3. Produce in electronic form all audio recordings of conversations by or with employees of Muskegon County or the Muskegon County Sheriff which were recorded by Plaintiff, whether on her phone or any other device.

RESPONSE:

ROSATI, SCHULTZ, JOPPICH
& AMTSBUECHLER, P.C.

/s/ Melanie M. Hesano
Laura S. Amtsbuechler (P36972)
Melanie M. Hesano (P82519)
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Dated: October 27, 2020

PROOF OF SERVICE

The undersigned certifies that the foregoing was served upon all parties to the above cause to each of the attorneys/parties of record herein at their respective addresses disclosed on the pleadings on 10-27-20.

BY: ☐ U.S. Mail ☐ Telefacsimile
☐ Hand Delivered ☐ Overnight courier
☐ Federal Express ☒ Other: E-mail

Signature: */s/ Julie Doll*

I DECLARE UNDER THE PENALTY OF PERJURY THAT THE ABOVE
AND FOREGOING ANSWERS ARE TRUE, COMPLETE AND CORRECT TO
THE BEST OF MY INFORMATION, KNOWLEDGE AND BELIEF.

LORI HEETHUIS

Subscribed and sworn before me this _____
day of _____, 2020

Notary Public
My Commission Expires: _____